

VIRGINIA:

IN THE CIRCUIT COURT OF CULPEPER COUNTY

CAROLYN R. RICHARDS,

Plaintiff,

v.

Case No. CL21000470-00

WALMART, INC.

SERVE: CT CORPORATION SYSTEM  
Registered Agent  
4701 Cox Road Suite 285  
Glen Allen VA 23060-6808  
(Henrico County)

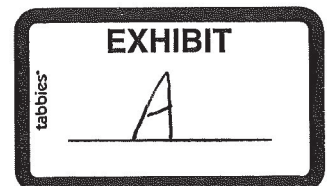
Defendant.

Filed in Culpeper County  
Circuit Court Clerk's  
Office 3-18, 2021  
Cynthia Dye DEPUTY  
CLERK  
1:30pm

COMPLAINT

The Plaintiff, Carolyn R. Richards, by counsel, hereby moves for judgment against Walmart, Inc., on the grounds and in the amount as hereinafter set forth:

1. Plaintiff Carolyn R. Richards is a natural person residing in Culpeper County, Virginia.
2. Defendant Walmart, Inc., operates a retail store doing business as Walmart located on 801 James Madison Highway in Culpeper County, Virginia.
3. On September 30, 2017, at approximately 2:30 p.m., Plaintiff was lawfully on the premises of the Walmart for the purpose of shopping. Ms. Richards was walking into the front entrance and tripped on an uneven joint between tiles in the floor near the front door.



4. At that time and place, the Defendant had a legal duty to keep the premises in a reasonably safe condition for the Plaintiff's use, consistent with her usage as a customer and business invitee.

5. At that time and place, a physical defect existed on the premises in the form of an uneven crack or joint in the floor surface.

6. Defendant Walmart, Inc., was negligent through its agents and employees in that it allowed the aforesaid defect to exist on the premises, when it had actually known of the defect or should have known of the defect through the use of ordinary diligence.

7. As a direct and proximate result of Defendant's negligence, the Plaintiff was caused to trip and fall in the store.


8. As a direct and proximate result thereof, Plaintiff sustained serious and permanent injuries, has suffered and will continue to suffer great pain of body and mind; has sustained permanent disability, deformity; has incurred and will incur in the future hospital, doctors and related bills in an effort to be cured of said injuries.

WHEREFORE, Plaintiff requests judgment against the Defendant, Walmart, Inc., in the sum of THREE HUNDRED AND FIFTY THOUSAND DOLLARS (\$350,000.00) in compensatory damages, her costs expended, and interest as allowed by law, computed from September 30, 2017.

**REQUEST FOR TRIAL BY JURY**

Plaintiff respectfully requests a trial by jury.

CAROLYN R. RICHARDS  
By Counsel

  
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